UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

-v-

JAIR SAAVEDRA,

Defendant.

OBCRIM 094

USDC SDNY
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COUNT ONE

The United States Attorney charges:

- 1. From in or about August 2005 through in or about December 2005, in the Southern District of New York and elsewhere, JAIR SAAVEDRA, the defendant, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.
- 2. It was a part and an object of the conspiracy that JAIR SAAVEDRA, the defendant, and others known and unknown, would and did distribute, and possess with intent to distribute, a controlled substance, to wit, five hundred grams and more of mixtures and substances containing a detectable amount of cocaine, in violation of Sections 812, 841(a)(1), and 841(b)(1)(B) of Title 21 of the United States Code.

Overt Acts

3. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and

elsewhere:

a. On or about December 29, 2005, JAIR SAAVEDRA, the defendant, attended a meeting in New Haven, Connecticut, about the sale of cocaine.

b. In or about December 2005, a co-conspirator not named as a defendant herein picked up a quantity of cocaine in the Bronx, New York.

(Title 21, United States Code, Section 846.)

MICHAEL J. GARCI

United States Attorney